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October 8, 1986

## VIA HAND DELIVERY

Mr. Guinn Doyle
Indiana Department of
Environmental Management
Solid and Hazardous Waste
Management Division
105 S. Meridian St., 9th Floor
Indianapolis, IN 46204

Re: Indiana Steel & Wire

Dear Guinn:

This letter confirms a number of points discussed in our recent conversation regarding the Indiana Steel & Wire ("IS&W") facility in Muncie.

As you know, the Indiana State Board of Health sent IS&W a letter dated January 7, 1986 confirming that IS&W had voluntarily agreed to undertake a number of steps in light of the groundwater situation along and west of the western portion of its plant. Paragraphs 3 and 4 of that letter provided:

- 3. Immediately provide a safe and adequate drinking water supply to any persons, residences, businesses or commercial establishments located within a one-half (1/2) mile radius of the Indiana Steel & Wire property, which presently do not have drinking water provided by a public water supply.
- 4. Establish a weekly well water analyses program, by February 1, 1986, for all residential and industrial wells within a one-half (1/2) mile radius. Water samples to be tested for both free and complex cyanide with results reported to both the Delaware County Health Department and the Division of Land Pollution Control.

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Since January 1986, IS&W has been providing bottled water to the residences, businesses, etc. described in ¶ 3 while it has been making arrangements to have them connected to public water. All of these locations have been connected to public water except for:

1. The following residents who have refused to allow IS&W to connect their homes to public water:

Mr.	Winifred Norris	201	North	Manhattan
Mr.	Denny Walburn	701	North	Biltmore
Ms.	Edith Walburn	607	North	Biltmore
Mr.	Harold Martin	600	North	Manhattan
Mr.	James Terry	609	North	Manhattan

IS&W's consultants, Geraghty & Miller and Drs. Roepke and Samuelson, have determined that groundwater is flowing west, southwest from the plant and away from these residences (see attached potentiometric maps prepared by Geraghty & Miller). The above-listed residences are located northeast, or upgradient, of IS&W's plant. In addition, IS&W has analyzed well water samples from each of these residences on a weekly basis since January 1986 and has never found any evidence of cyanide.

IS&W respectfully requests that the State excuse it from the requirement of providing drinking water (including bottled and public water) to these homes because the residents refuse to have their homes connected to public water, because the homes are located upgradient of the site, and because IS&W has found no evidence of any cyanide contamination in these wells.

2. The residences at 2819, 2821 and 2825 East Jackson Street because there is no existing public water main and no public right-of-way in which to build a new main. These residences are located nearly 1/2 mile east, southeast of the plant and, given groundwater flow, should not be affected by any contamination emanating from the plant. In addition, IS&W's residential well sampling program has never revealed the presence of any cyanide in these wells. IS&W requests that the State excuse it from the requirement of providing drinking water (including bottled or

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> public water) to these residences as well in light of the difficulties involved in connecting them to public water and in light of the facts that they are not located downgradient of the site and cyanide has never been found in these wells.

3. The Broderick Hammer Plant (500 Lincoln Street) and the resident located at 1704 East Gilbert (Mrs. Maude Byrne), which are located on the opposite side of White River from IS&W's plant. There are no water mains currently available to connect these locations to public water. Although it is likely that the White River serves as a hydraulic discontinuity, IS&W will continue to provide bottled water to these locations for the time being.

Paragraph 4 of the State's January 7, 1986 letter requires IS&W to sample all water supply wells within 1/2 mile of the plant for cyanide on a weekly basis. Since IS&W has found no cyanide in any residential wells; since public water has been provided to all such residences with the above-discussed exceptions; and since IS&W's consultants tell us that ground-water is flowing to the west, southwest, IS&W also requests that the frequency of sampling these wells be reduced from once a week to once a month. At some later point, IS&W may ask that the frequency of well sampling be further reduced or discontinued based upon the results of its continuing investigations.

We would appreciate it if the Department would send me a letter amending David Lamm's January 7, 1986 letter in the respects discussed above.

For your information, IS&W has now installed a total of 58 groundwater monitoring wells at and around its plant. Although not required by the State's January 7, 1986 letter, IS&W has been sampling and testing each of these wells every two weeks for cyanide. IS&W has, at the suggestion of Geraghty & Miller, reduced this sampling frequency to once per month.

IS&W's consultants are currently working on an interim report as well as a list of additional remedial investigation activities to guide us in the coming months. As soon as those

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documents are finalized, we will forward them to you, Jackie Strecker and EPA Region V.

As in the past, I want to thank you and members of your Department for your continued cooperation. Please call if you have any questions or comments.

Sincerely

ohn M. Kyle III

JMK:dlf Enclosure

CC: The Honorable James P. Carey, Mayor, City of Muncie Clyde G. Botkin, M.D., Delaware County Health Officer Mr. Jeffrey Hole, Delaware County Health Department Mr. John Craddock, Director, Muncie Sanitary District

Ms. Jackie Strecker, Department of Environmenal Management

Mr. Norman Niedergang, U.S. EPA, Region V



